

# **EXHIBIT C**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: : 03-MD-1570  
TERRORIST ATTACKS ON SEPTEMBER 11, 2001 : 500 Pearl Street  
: New York, New York  
: : July 13, 2011

TRANSCRIPT OF CIVIL CAUSE FOR CONFERENCE  
BEFORE THE HONORABLE FRANK MAAS  
UNITED STATES MAGISTRATE JUDGE

APPEARANCES:

For Federal Insurance: SEAN P. CARTER, ESQ.

For Dubai Islamic Bank: STEVEN COTTREAU, ESQ.

For Havlish: TIM FLEMING, ESQ.

For Plaintiffs: JAMES KREINDLER, ESQ.  
ROBERT T. HAEFELE, ESQ.  
TIM FLEMING, ESQ.

For Defendants: MARTIN F. McMAHON, ESQ.  
ALAN KABAT, ESO.

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1 of course have their own bank accounts locally. In other  
2 words, we don't have any of those bank statements whatsoever.

3 So in sum total, we felt that the phone call we had  
4 with Mr. Radhi merely served to confirm that very little  
5 effort, very little true effort, has been invested in actually  
6 searching and confirming that all responsive materials have  
7 been aggregated and produced. And you know there have been  
8 some very specific orders and frankly we've been at this effort  
9 to try and obtain these particular documents for many years  
10 now. As Your Honor can probably appreciate, we're sort of  
11 reaching the point of exhaustion.

12 THE COURT: Mr. McMahon? Apparently he's reached the  
13 point of exhaustion also. I know I asked him to mute his  
14 phone. Maybe it's taking a second. Why don't you call him on  
15 --

16 MR. McMAHON: Hello?

17 THE COURT: Oh. I take it you heard everything that  
18 Mr. Carter just said. Okay?

19 MR. McMAHON: Yes. I'll try to take it the way Mr.  
20 Carter presented it.

21 THE COURT: Well, let me ask you a question at the  
22 beginning because I think it was last time we spoke you said  
23 that you had put off a trip to Saudi Arabia because you wanted  
24 to make sure that some issues had been resolved before you went  
25 there. But then I seem to recall there was a letter that said

1 there were insufficient funds for you to come to New York for  
2 this conference which suggested that perhaps there were not  
3 sufficient funds for you to go to Saudi Arabia. So I'm trying  
4 to understand the extent to which you've actually been able to  
5 sit down face to face with the folks who ought to be producing  
6 the documents, Mr. Radhi and others.

7 MR. McMAHON: Yes, Your Honor, good question. Mr.  
8 Radhi wants me to come to Saudi as does the head of IIRO and  
9 the head of MWL but there are no funds currently to take care  
10 of that. And unfortunately, Your Honor, what's coming up  
11 shortly is Ramadan when things really shut down in Saudi  
12 Arabia. I'm hesitant to go over there during that time unless  
13 I can get out of there maybe three days after it starts.

14 But yes, Your Honor, there's still a financial issue  
15 about me getting over there. However, because some people now  
16 understand the severity of the situation, there are ongoing  
17 attempts to get me some travel funds. They just haven't come  
18 in yet. Again, I told IIRO's chief executive officer this  
19 morning, Dr. Basha, that I can't do anything unless the funds  
20 are here. So yes, we have an ongoing funding issue.

21 THE COURT: Okay. I interrupted you by asking about  
22 travel. Why don't you go on to the other points?

23 MR. McMAHON: Well, let me get something out of the  
24 way, Your Honor, so that we can see something. There is this  
25 gap for the '92, '93, '94 banking records. Now, what Samir